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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

MERIDIAN TREATMENT SERVICES, *et*
al.,

Plaintiffs,

vs.

UNITED BEHAVIORAL HEALTH
(operating as OPTUMHEALTH
BEHAVIORAL SOLUTIONS),

Defendant.

CASE NO. 4:19-cv-05721-JSW

**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING SCHEDULE**

Judge: Hon. Jeffrey S. White

Amended Complaint filed: November 12, 2020

1 TO THE COURT:

2 The parties hereto, Defendant United Behavioral Health (“Defendant”) and Plaintiffs Meridian
3 Treatment Solutions, Inc., Desert Cove Recovery, LLC and Harmony Hollywood, LLC (“Plaintiffs”)
4 (collectively referred to as “the Parties”), by and through their undersigned counsel of record, hereby
5 stipulate as follows:

6 WHEREAS, this Court previously set a deadline of January 15, 2023 for the completion of
7 Plaintiffs’ depositions of Defendant for the class certification phase of this case [Dkt. 89; Dkt. 94];

8 WHEREAS, the Parties were prepared to complete by the January 15 deadline the two
9 depositions of Defendant noticed by Plaintiffs’ counsel;

10 WHEREAS, on December 28, 2022, the Relativity domain Plaintiffs’ counsel use for e-
11 discovery purposes was disabled by the host of the domain due to the investigation of a security
12 incident, which Plaintiffs’ domain host has attested was not due to any fault of Plaintiffs’ counsel Arnall
13 Golden Gregory LLP (*see* Exhibit A, Jan. 4, 2023 letter from Ricoh to Plaintiffs’ counsel);

14 WHEREAS, Plaintiffs’ counsel assert that the inability to access these materials has
15 substantially impacted their ability to prepare for the upcoming depositions of Defendant, necessitating
16 an extension of the existing January 15, 2023 deadline;

17 WHEREAS, Plaintiffs’ counsel assert that Plaintiffs’ Relativity domain host restored some
18 access to Plaintiffs’ e-discovery platform on the evening of January 4, 2023, and Plaintiffs anticipate
19 full restoration of their access to the e-discovery platform in sufficient time to complete the two
20 previously noticed depositions by February 15, 2023;

21 WHEREAS, both Parties agree that an extension of the deadline to complete Plaintiffs’
22 depositions of Defendant to and including February 15, 2023 will address the above unexpected e-
23 discovery issues, and also not require any other schedule adjustments or impact the Court’s calendar;

24 WHEREAS, the Parties also agree that this stipulated extension will not be cited as a basis to
25 seek further discovery beyond the two already-noticed depositions, or to extend any of the other
26 existing deadlines in this case, including but not limited to the January 4, 2023 class certification fact
27 discovery deadline, the February 15, 2023 deadline for Defendants’ depositions of Plaintiffs for the
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class certification phase of the case, and the briefing schedule and hearing date for Plaintiffs' motion for class certification [*see* Dkt. 94].

NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, through their respective counsel of record and subject to the Court's approval, that the schedule be modified as follows:

- The deadline for the completion of Plaintiffs' two previously noticed depositions of Defendant for the class certification stage of the case is extended to and including February 15, 2023.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: January 6, 2023

ARNALL GOLDEN GREGORY LLP

By: /s/ Matthew M. Lavin
Matthew M. Lavin

DL LAW GROUP

By: /s/ David M. Lilienstein
David M. Lilienstein

Attorneys for Plaintiffs

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Geoffrey Sigler
Geoffrey M. Sigler

Attorneys for Defendant

[PROPOSED] ORDER

Having considered the Parties' Joint Stipulation and [Proposed] Order Regarding Schedule, the Court HEREBY ORDERS as follows:

- The deadline for the completion of Plaintiffs' two previously noticed depositions of Defendant for the class certification stage of the case is extended to and including February 15, 2023.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Hon. Jeffrey S. White
United States District Judge